



April 10, 2014

United States Environmental Protection Agency - Region 2  
DECA - PTSB - Toxic Substances (MS-105)  
2890 Woodbridge Avenue (MS-105)  
Edison, New Jersey 08837

Attn.: Henry Mazzucca, P.E., Chief

**Re: 12th Quarterly Status Report  
PCB Remedial Action  
Arsynco, Inc. Site  
Carlstadt, New Jersey**

Dear Mr. Mazzucca:

In accordance with Section 5 of the USEPA's *Approval for Risk-Based Clean-up/Disposal of Polychlorinated Biphenyl Remediation Waste* for the Arsynco site, which became effective on July 21, 2009 (the "EPA Approval"), the following provides the 12th Quarterly Status Report for the PCB remedial action at the Arsynco facility.

The following activities/actions have occurred in relation to the site since the last Status Report was submitted to EPA on October 22, 2012:

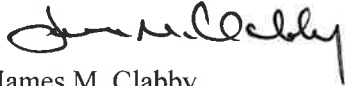
- Arsynco conducted additional, pre-excavation, confirmatory PCB grid sampling across both Tract 1 and Tract 2 of the site during the period October 2012 through January 2014. Overall, more than 3,500 additional samples were collected and analyzed for PCBs during the approved grid sampling program. The initial 20-foot grid sample data was used to develop a scope for additional grid delineation sampling in certain areas (i.e. - narrowing sampling to less than 20-foot grid pattern) to attempt to reduce the quantity of material requiring disposal and consolidation. The sample data will provide detailed confirmation of the areas containing material that requires either consolidation or removal under the EPA Approval and will define the horizontal and vertical boundaries where PCBs are present at concentrations  $\geq 50$  ppm and  $\geq 500$  ppm. The resulting "compliance point" sample locations will be used to predetermine the boundaries of the required excavations in each area and will also serve as final excavation end-point verification samples. Each of the grid sample locations were surveyed by a NJ-licensed surveyor.
- In addition to the actual sampling activities, work completed during the period included managing, tabulating and mapping (conventional and GIS) the vast amount of PCB sample data collected at the site (over 3,500 additional samples). We are currently analyzing the large amount of sample data obtained from this program so that the detailed scope of work for the PCB remediation program can be developed and accurate information can be compiled to put the work out to contractor bid.

- As noted in the last Status Report, Arsynco received a letter from EPA that provided EPA's comments on the financial assurance documents previously submitted by Arsynco. On January 6, 2012, Arsynco submitted an e-mail reply to EPA's letter. The e-mail response was submitted to Ms. Vickie Pane, of EPA, and requested clarification and specificity on EPA's comments to ensure that Arsynco's responses would fully satisfy EPA's requirements. On January 10, 2012, Arsynco submitted a second e-mail to Ms. Pane that provided a signed version of the letter of credit, which addressed one of the comments contained in EPA's October 2011 letter, and again requested a response from EPA clarifying the inquiries stated in the January 6, 2012 e-mail. As of the date of this letter, no response has been received from EPA on these issues.

The approval of the remaining financial surety issues is critical to allow the PCB remediation program at this site to move forward. Therefore, Arsynco respectfully requests EPA's timely review and response to the remaining financial surety questions.

Should you have any questions or require additional information regarding this matter, please feel free to contact me at (732) 295-2144.

Very truly yours,



James M. Clabby  
President

cc: James Haklar, USEPA  
Jay Nickerson, NJDEP